TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 22, 2010

Mr. Bret Kendrick, Site Assessment Manager
Superfund Division
U.S. EPA, Region 6
1445 Ross Avenue, Suite 200
Dallas, Texas 75202

Re: Addendum to November 2010 Pre-CERCLIS Screening Assessment for Dixico Industries, Inc.; Radiation screening at the former Dixico, Inc. facility; EPA ID: TX 098423536

Dear Mr. Kendrick:

At the request of the U.S. Environmental Protection Agency (EPA), the Texas Commission on Environmental Quality (TCEQ) has completed the radiation screening at the former Dixico, Inc. facility located at 1300 South Polk Street in Dallas, TX. The survey was conducted on December 14, 2010 for the presence of radioactive material contamination (specifically radium-226) and was performed by investigators from the TCEQ's Office of Compliance and Enforcement, Homeland Security Program. This letter serves as an addendum to the November 2010 Pre-CERCLIS Screening Assessment for the Dixico Industries, Inc. site.

Prior to conducting surveys of the areas of concern at the site, the natural background radiation level (gamma radiation) was determined by surveying near the entrance of the facility located at Polk and Lebanon Streets. The survey instrument measured the background levels to be 8-10 micro Roentgen per hour (μR/hr) and 2500-3000 counts per minute (CPM). The areas of concern that were screened included the former underground tank location (Area 1), the former incinerator location (Area 2), and the former drum storage area (Area 3). Readings for the areas of concern were within the same range as the background readings indicating that no radioactive contamination was found.

The attached email describes the methods used in screening, the instruments used, and the calibration criteria. The attached site map shows the background readings and the readings

from the above mentioned areas of concern. Also included are copies of the field notes and the site photographs.

If there are any questions or further information required for this site, please contact me at 903-535-5175.

Sincerely,

Dean Perkins, P. G., Project Manager
Remediation Division
Texas Commission on Environmental Quality

Attachments

From: Muhammadali Abbaszadeh
To: Perkins, Dean
CC: Beleckis, Robert; Carlisle, Laurel; Cook, Kelly; Kohler, Dale; Sher,...
Date: 12/17/2010 10:40 AM
Subject: Dixico Site Visit
Attachments: Radiation Measure at Dixico 2010.12.15.pdf

Dean,

Let me know of any comments/questions you may have prior to distributing this e-mail to EPA or others. If you agree with the content of this e-mail, please distribute it as you see it fit.

At the request of the EPA/TCEQ Remediation Division, on 12/14/2010, Sonia Simmons and I (the investigators) of the Office of Compliance and enforcement (OCE), Homeland Security Program, conducted radiation surveys at the former Dixico, Inc. site in Dallas, Texas for presence of radioactive material contamination (specifically radium-226). Mr. James Sher of the OCE, Homeland Security Program and Mr. Dean Perkins of the TCEQ Tyler office assisted the investigators during the site visit.

Prior to the surveys, operability of each radiation survey instrument was checked using a radiation check source to assure instruments are working properly. Prior to conducting surveys of the areas within the site for presence of radioactive material contamination, the investigators measured the natural background radiation levels (gamma radiation) at the entrance gate and areas within the drive way to the site. Background radiation levels were measured in micro Roentgen per hour (μR/hr) and counts per minute (CPM). Readings were recorded approximately one inch to a foot above ground surface. Ambient Background radiation levels were also measured (holding the detector facing up at approximately 4 feet above the ground surface). Surveys of the areas within the site were conducted in the same manner as surveys for background. Readings for background radiation levels and the areas surveyed within the site are plotted on the attached site map. No contamination was found. Survey readings were at or below background levels.

A Ludlum survey meter Model 14C, serial number 119994, coupled with a 1x1 sodium iodide (NaI) detector, Model 44-2, serial number PR126805 and a Ludlum Micro R survey meter Model 19, serial number 111301 were used to measure the background radiation levels in CPM and μR/hr respectively. Both instruments were calibrated on October 22, 2010. The calibration is valid until October 22, 2011.

Muhammadali Abbaszadeh, Work Leader
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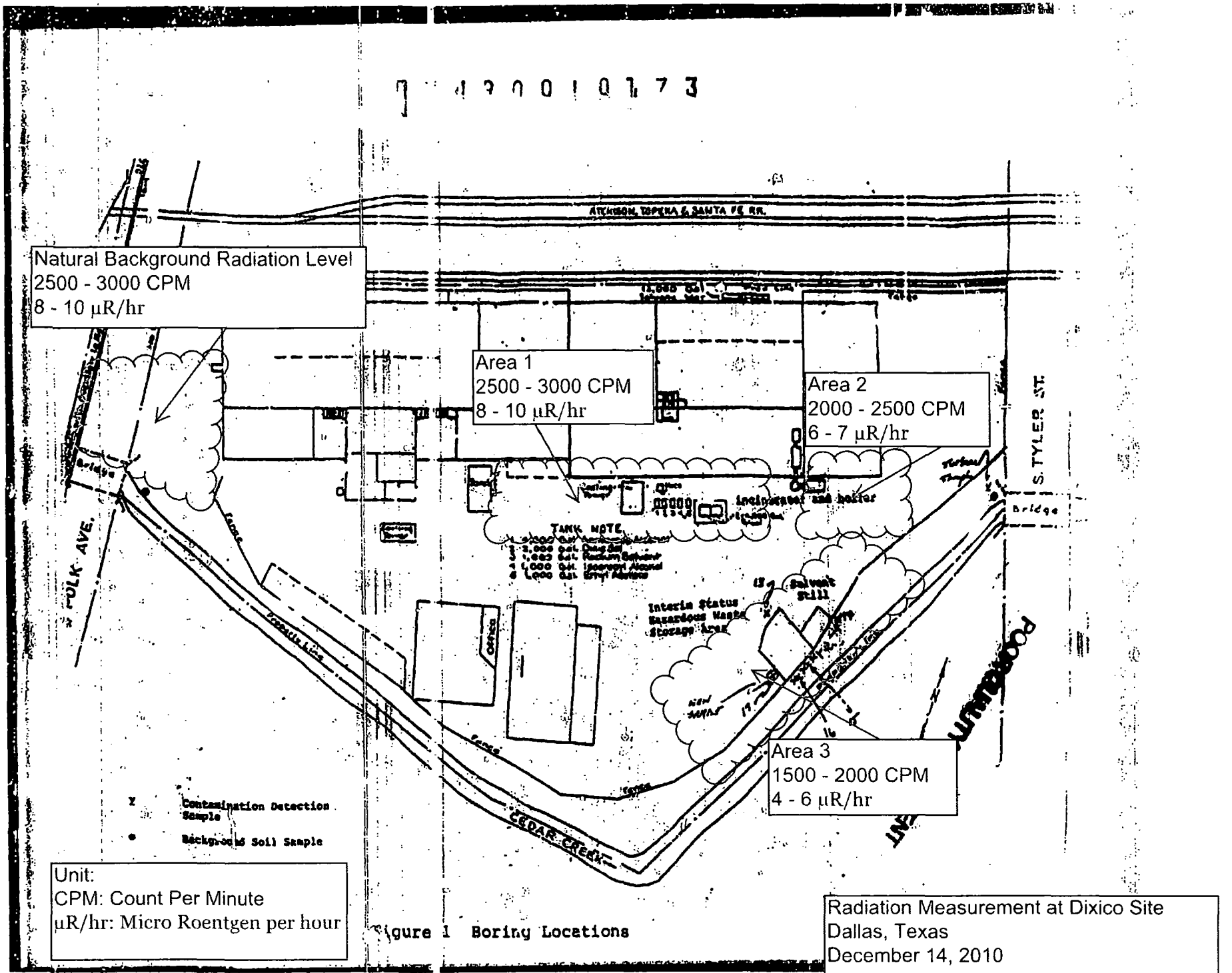

Figure 1 Boring Locations

Radiation Measurement at Dixico Site
Dallas, Texas
December 14, 2010

12/14/2010
old Dixico facility

Dean Perkins, Muhammadilo Abbaszadeh, Sonic Simmons
Jim Shen
Safety briefing 8:30 - 8:35
Clear, 35°, south wind 0-5 mph

Instruments calibrated @ 8:30
count per minute readings
pic #1 - Background readings at entrance gate
+ Polk + Lebanon @ 3,000 MICROR/hr

- blocks of bldg having a little higher reading (expected)

pic #2 - Screening @ 2500-3000 @ UST location
#3 micro R/hr

pic #4 - screening @ 2000-3000 @ old incinerator location
micro R/hr

pic #5 - screening @ 1500-2000 @ drum storage area
micro R/h

Screening indicates no areas of concern

Exposure rate
8-10 micro R/h old UST area

6-7 micro R/h old incinerator area

4-6 micro R/h old drum storage
Dean Perkins 12/14

Photos photographer - Dean Perkins

① Background reading @ Entrance to property - looking north

② Screening @ UST area - looking north

③ Screening @ UST area - looking north

④ screening @ incinerator - looking north

⑤ screening @ old drum storage - looking south

Dean Perkins 12/14

Photo #1 Taken by Dean Perkins, 12/14/2010, facing north. Background screening location.

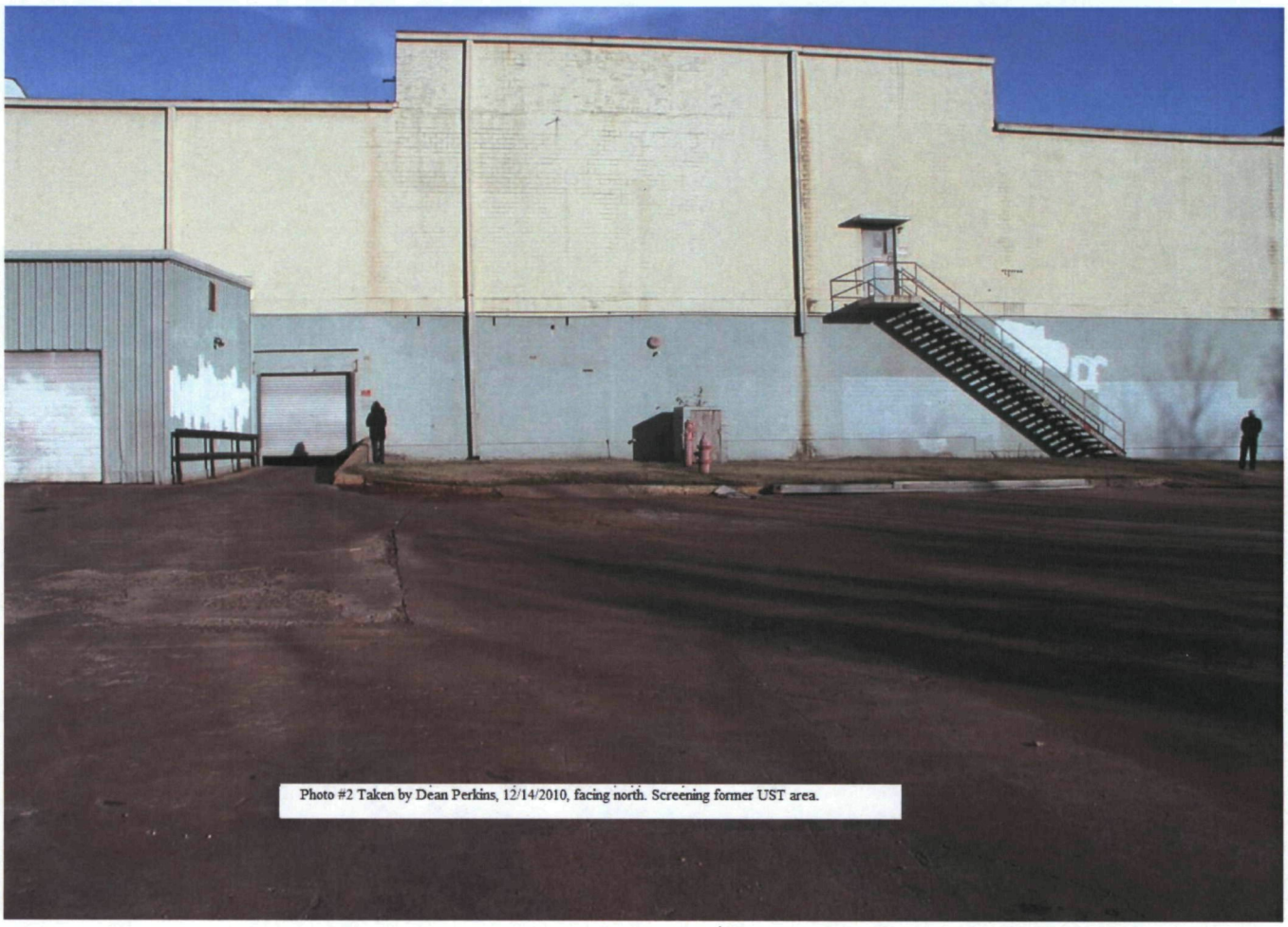

Photo #2 Taken by Dean Perkins, 12/14/2010, facing north. Screening former UST area.

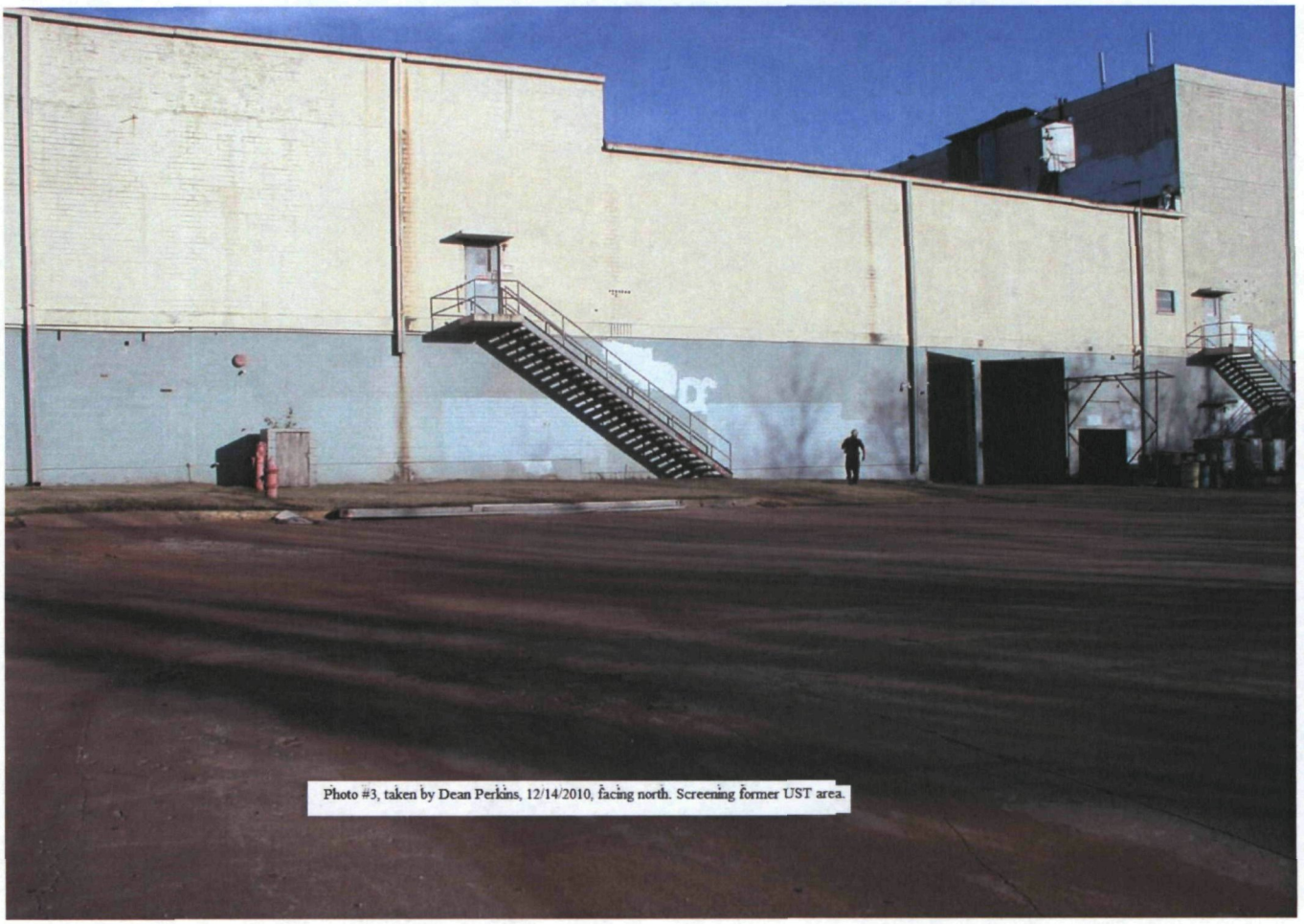

Photo #3, taken by Dean Perkins, 12/14/2010, facing north. Screening former UST area.

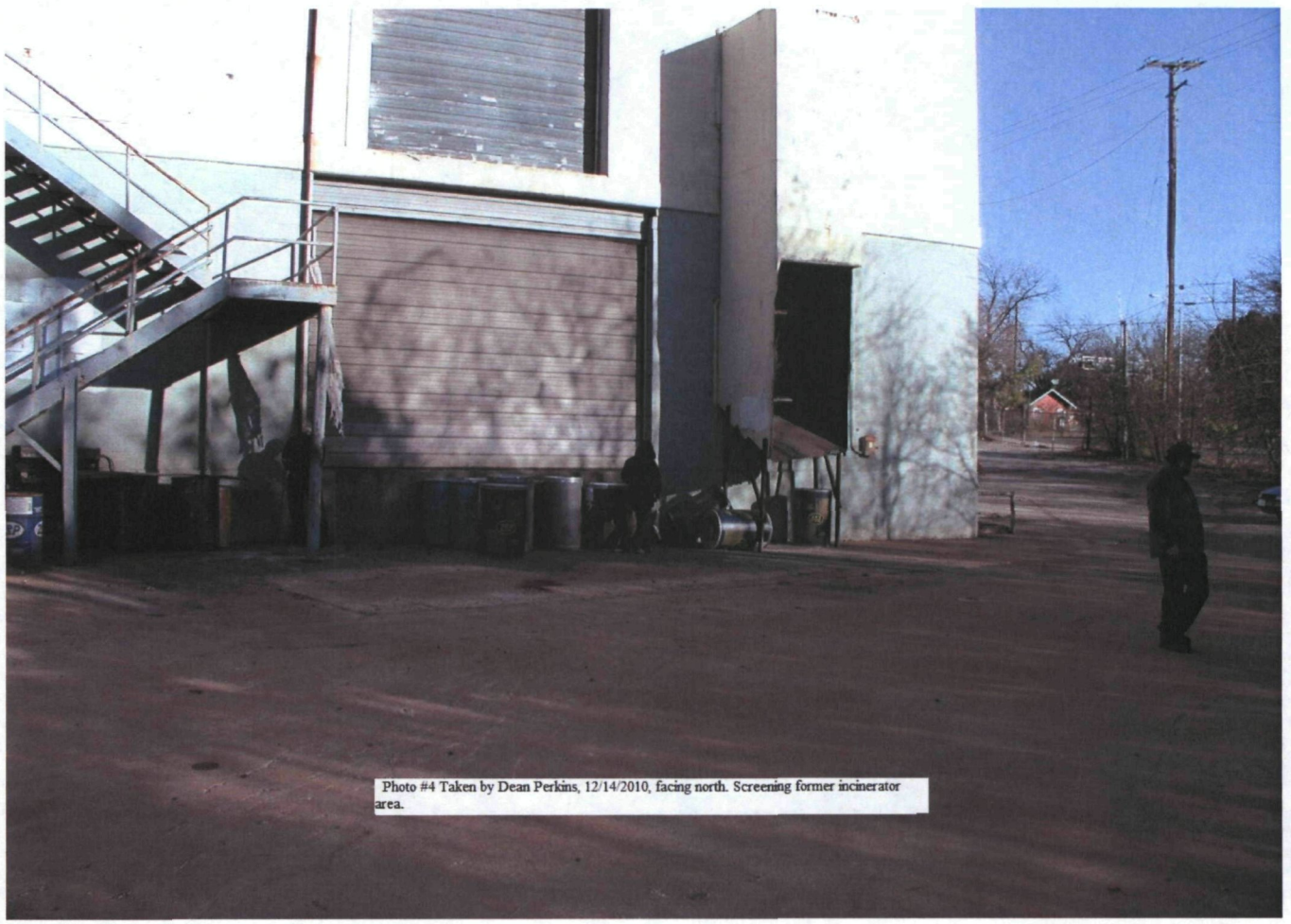

Photo #4 Taken by Dean Perkins, 12/14/2010, facing north. Screening former incinerator area.

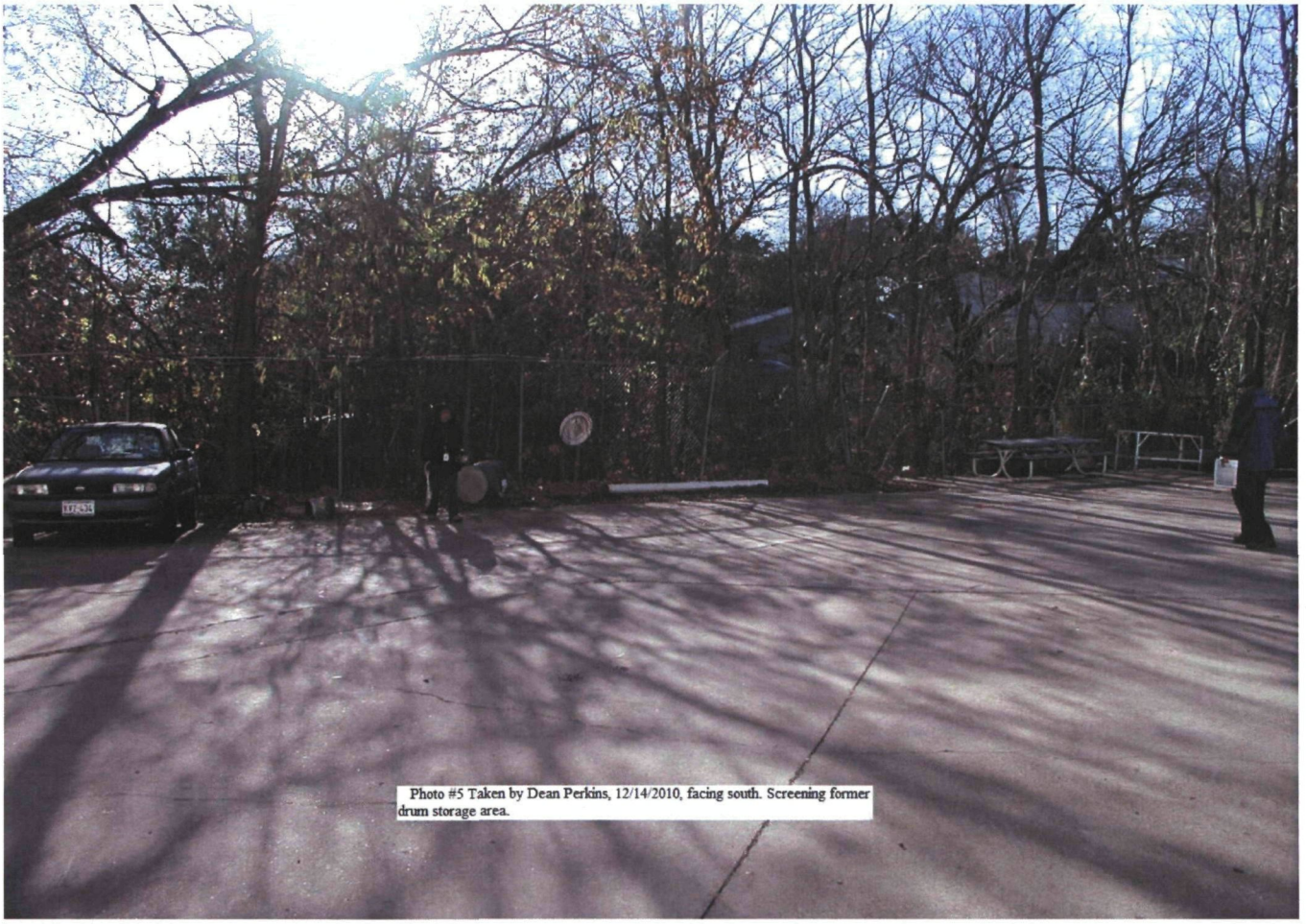

Photo #5 Taken by Dean Perkins, 12/14/2010, facing south. Screening former drum storage area.